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West Michigan Environmental Action Council

1324 Lake Drive, S.E. Grand Rapids, Michigan 49506 616-451-3051

May 26, 1978

Mr. David Dennis, Chief
Oil & Hazardous Materials Section
P.O. Box 30028
Lansing, MI 48909

Dear Dave:

We have become aware through conversations with Jim Miller of your staff, as well as officials of the Kent County Department of Public Works, that waste resulting from the clean up of the Story Chemical operation have been deposited in various landfills throughout the state. Our information suggests that materials were disposed of in landfills in Muskegon, Plainfield Township (Kent County), Watervliet, and Port Huron. There may be others which we are not aware of.

We are exceedingly concerned about the environmental acceptability of these sites to receive such waste and the degree of ground and surface water protection provided at each of the sites.

Our concern stems from our immediate knowledge of the problems and limitations of the Plainfield Township site which has been "billed" as one of the most environmentally secure sites in the state.

Despite this claim, there are serious operational and unresolved design problems that have forced DNR officials in the Resource Recovery Division and Water Quality Division to take action against the facility within the last month. In the opinion of the Resource Recovery Division, (with which we agree) the violations are so severe that no license has been issued for the 1977-78 licensing period, and the Division has warned the County that the license may be denied if corrective action is not taken immediately.

Although we have heard varying reports of the type and amount of material that was sent to Plainfield Township from the Story Chemical site, Jim Miller reports that the material was contaminated soils, old empty barrels and palets, containing low levels of alcohol and xylene "a perfumed based material" that is harmless and no problem.

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Translating concern
into action

After viewing the slide show of Andy Hogarth in your Division depicting the Story Chemical mess, which included slides of contaminated soil and palets caused from the random discarding and storing of unknown quantities and types of extremely hazardous materials, it is difficult to believe that the material disposed of in Plainfield Township could have been so carefully sorted and of such uniform consistency to contain only traces of so called "harmless" wastes.

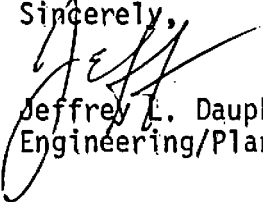
The fact is that the Plainfield Township Landfill is not a hazardous waste disposal site, and it was never intended to be nor designed to be. Any hazardous waste is specifically excluded by contract between Plainfield Township and Kent County, and it is a matter of record in the contested case hearing held on the site in 1975-76. Additionally, recent operational problems at the site have resulted in violations of State Solid Waste Act, the Water Resources Commission Act, the Soil Erosion and Sedimentation Control Act and the Federal Water Pollution Control Act.

Considering our concern over the safe operation of this site and our direct participation as a party in the contested case hearing on this facility and our demonstrated concern for proper management of waste throughout the state, we hope that you will honor our following request for information:

1. The manifest for all material deposited in the Plainfield Township Landfill, including dates of deposit, volumes of material, chemical analysis of material, the concentrations, and the frequency and number of chemical tests.
2. The complete manifest for all material from the Story Chemical clean-up indicating the type, quantity, detailed chemical analysis and concentrations with dates and locations for disposal of all the materials.
3. Names and dates of state and local officials and/or operators who authorized the disposal of materials to the various sites.

Your prompt action in responding to this request will be appreciated.

Sincerely,


Jeffrey L. Dauphin
Engineering/Planning Coordinator

JLD/sjb

Enclosure

cc: Howard Tanner
Wayne Tody
Fred Kellow

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MAY 31 1978
RESOURCE RECOVERY DIV